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| UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY | |
| Caption in Compliance with D.N.J. LBR 9004-1(b) NORGAARD, O'BOYLE & HANNON 184 Grand Avenue Englewood, New Jersey 07631 Telephone Number (201) 871-1333 Facsimile Number (201) 871-3161 <i>Attorneys for Debtor, Hatice F. Ulu</i> By: MARK NORGAARD, ESQ. MN-7407 Email [mnorgaard@norgaardfirm.com] | Case No.: 19-33785 Chapter: 13 |
| In Re: HATICE F. ULU | Judge: Vincent F. Papalia |

**SUPPLEMENTAL CERTIFICATION IN SUPPORT OF MOTION FOR
AUTHORIZATION TO SELL REAL PROPERTY AND FOR ALLOWANCE OF
BROKER'S COMMISSION AND ATTORNEY FEES**

MARK NORGAARD, Esq. certifies as follows:

1. I am an associate with Norgaard O'Boyle & Hannon, the attorneys for the Debtor, Hatice F. Ulu. I make this supplemental certification in support of the Debtor's Motion for Authorization to Sell a certain piece of real property pursuant to 11 U.S.C. Sec. 363(b) and for Allowance of the Broker's Commission and Attorney's Fees Pursuant to 11 U.S.C. Sec. 328(a) and 503(b)(1).
2. On December 8, 2020, This Court entered an order authorizing the sale of the Debtor's property free and clear of judgment liens, allowing legal fees and brokers' commission (the "Order"). *See* Docket # 74.

3. The Order authorized the Debtor to sell her property to the Purchasers for the sum of \$1,900,000.00 and approved broker commissions totaling \$95,000.00.

4. After entry of the Order the parties have mutually agreed to a reduction of the Purchase price from \$1,900,000.00 to \$1,852,500.00 in order to reflect the waiver of ½ of the total brokers' commission owed to the Purchaser's broker. Accordingly, the price reduction does not reduce any sums that would have otherwise been paid to creditors.

5. This new purchase price will not negatively affect the Debtor's bankruptcy estate and will still result in a 100% plan distribution. Once again, I want to repeat that the reduction of the sale price does not reduce the amount that will be paid to the Debtor from the sale and the sale will still result in a 100% payment to call creditor.

6. The Purchasers' broker, Jesse Haliburton of Prime Real Estate Group, has waived his entitlement to a commission equal to 2.5% of the purchase price.

7. The Debtor's broker, Christine Gubb of Keller Williams, will still receive a commission of 2.5% of the purchase price. Accordingly, the reduced purchase price will result in a lower overall brokerage commission.

8. An amended order approving the sale of the Debtor's property should be entered to account for the amendments contained herein.

WHEREFORE, the Debtor respectfully requests that this Court enter an Amended Order Authorizing the Sale of the Property.

I certify that the foregoing statements are true. I am aware that if the foregoing statements are willfully false, I am subject to punishment.

Dated: 12/22/2020

/s/ Mark Norgaard, Esq.
Mark Norgaard, Esq.